

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA

DIVISION 1 2025 FEB 26 P 1:26

RECEIVED  
TREY COANER, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

Albert Edmonds Iii

Plaintiff(s),

v.

Group 1 Automotive (DBA) Sterling McCall Ford

Group 1 Automotive

Defendant(s).

CIVIL ACTION NO. 2:25-cv-00166-RAH-SMD

JURY DEMAND (MARK ONE)

☒ YES ☐ NO

COMPLAINT

1. Plaintiff(s)' address and telephone number: 1655 Gilmer Ave Montgomery AL 36104 Ph. 678\*414\*3763

2. Name and address of defendant(s): Sterling McCall Ford 6445 Southwest Freeway, Houston, TX 77074  
;Group 1 Automotive Group 1 Automotive, Inc 730 Town & Country Boulevard, Suite 500 Houston, TX 77024

3. Place of alleged violation of civil rights: Sterling McCall Ford 6445 Southwest Freeway, Houston, TX 77074

4. Date of alleged violation of civil rights: June 16th 2023

5. State the facts on which you base your allegation that your constitutional rights have been violated: Discrimination in violation of ADA Title III; For not providing reasonable accommodations  
Dealership and Group 1 corporate office ignore my grieves regarding my extra cost for dealership mishaps and mistakes  
Dealership management Berated Plaintiff NS Humiliated plaintiff by resorting to diminished plaintiff ,  
for making large deposited and having a 3 rate credit scorewhlie yelling and arguing with plaintiff..  
thief by deception Dealer added items that were defective and promises to refund in full and lied that customer,  
did not want and stated. Dealer Management promise to refund taxes pay for new fees.  
Thief by taking dealership took in full tax monies to reregister the plaintiff's F 150 but Failed to do so,

6. Relief requested: Compensatory Damages (non economic damages) for pain and stuffing, humiliation and loss of enjoyment of life and emotional damages of \$350,000

Economic damages for hotel stays, meals, fuel cost, tint damages, bed locks, dent repair plan, taxes and fees for Plaintiff's F 150, refund of cost for F- 150

Punitive damages of \$250,000 from Group 1 automotive for being complicit, while ignoring and not resolving known complaints against its own dealership and not issuing title and registration in the state of Alabama after corporate office received complaint and After Mr. Crow stated he contacted a dealership in Mobile, Al to resolve my registration.

Against Punitive damages of \$550,000 for compensation for violation of disability rights under ADA Title III and Humiliation during waiting for tag and Refunds. (more see appendix)

Date: 02/19/2025



Plaintiff(s) Signature

## Appendix

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

Plaintiff(s),

Albert Edmonds

1655 Gilmer Ave

Montgomery Al 36104

v.

Defendant(s)

Group 1 Automotive DBA, Sterling McCall Ford

6445 Southwest Fwy

Houston, TX 77074

;

Group 1 Automotive

730 Town & Country Boulevard, Suite 500

Houston, TX 77024

1 Thief by taking: dealership took in full, tax monies to reregister the Plaintiff's F 150 but Failed to do so, defendant was ask to complete this purchase in full or refund all monies paid to dealership for vehicle and fees paid in full. Dealership refused. Adding extra services after the automobile deal was sent to the finance off it was added in the documents to complete at the last minute to complete and I asked for REFUND from the manager of finance "Wally" and he refused. And "Jose", the sales rep stated he would refund Plaintiff for tint on windows as it was damaged at time of delivery, and the refund or repair was never done!

2. Thief by deception: Dealer added items that were defective or not wanted at delivery and was asked not to add by Plaintiff, later Rodney Crow promises to refund in full by crediting Ford Motor Credit account, which was never done. Dealer Management promise to refund taxes pay for new fees regarding registration for vehicle and cost for extra travel and other cost occurred by having to stay Sunday and to Tuesday meals, hotels, and other direct cost occurred by Plaintiff.

Tuesday, February 25, 2025

Civil action no. \_\_\_\_\_





3. Discrimination: Dealership and its agents in violation of ADA Title III. For not providing reasonable accommodations for contract reviewable and comprehension and taking advantage of disability constraints and adding more items without disclosures beforehand.

4. Dealership and Group 1 corporate office ignore Plaintiff's grieves by in-person complaints, phone calls, mailed letter, and 3<sup>rd</sup> party complaints regarding Plaintiff's extra cost for dealership mishaps and mistakes causing emotional hard, embarrassment, and humiliation.

5. After mailing the CEO Daryl Kenningham, the GM of Sterling McCall Ford, Rodney Crow reached out to the Plaintiff, Dealership management Berated Plaintiff NS Humiliated Plaintiff by Rodney Crow resorting to repeatedly diminishing Plaintiff for making large deposited and having a 3 rate credit score and could not receive a decent financing.

#### Plaintiff Seeks awards

- I. Compensatory Damages (non economic damages) for pain and stuffing, humiliation, and loss of enjoyment of life and emotional damages \$350,000
- II. Economic damages for hotel stays, meals, fuel cost, tint damages, bed locks, dent repair plan, taxes and fees for Plaintiff's F 150, refund of cost for F- 150.
- III. Punitive damages of \$250,000 from Group 1 automotive for being complicit, while ignoring and not resolving known complaints against its own dealership and not issuing title and registration in the state of Alabama after corporate office received complaint and After Mr. Crow stated he contacted a dealership in Mobile, Al to resolve Plaintiff's registration. Adding to fear in experiencing in driving F150 not knowing if I would be pulled over and beaten shot or just simply ticketed.
- IV. Punitive damages of \$550,000 for compensation for violation of disability rights under ADA Title III and Humiliation during wait times, lying regarding pricing adjustments during sale process and during response of complaint, failure to register F150 failure to complete in full buying process degrading DEFENDANTS ACTIONS OR LACK THEREOF PREVENTED Plaintiff from selling or trading vehicle due to it being unregistered and untitled (until April 2024, SC said title only was issued) Plaintiff with regards to credit score Repeat after plaintiff had explain it was not relevant to any to any treatment provided by dealership and its partners.
- V. An injunction against the defendant, as Time is of the Essence for \$1000 per day payable to the plaintiff each day the economic damages are not resolved, and vehicle matter is not resolved.

Tuesday, February 25, 2025

Civil action no. \_\_\_\_\_

Wednesday, May 31, 2024

To: Group1 Automotive, Sterling McCall Ford and the Ford Motor Company

Dear Mr. Crow, GM- Sterling McCall Ford

This is my personal buying experience with Group1 Automotive (GPI, NYSE) DBA in Houston, TX; Sterling McCall Ford and the Ford Motor Company (F) NYSE.

On June 16<sup>th</sup> 2023 I made contact with Sterling McCall Ford in Houston, TX via CarGurus (A Group1 Automotive dealership) for a new 2023 F-150. When I spoke to someone it was Jose Gonzales, he would walk me through the buying of my new F-150.

During our process I was very upfront with Jose stating that I was a cash buyer and I would not want any hiccups or missteps during my buying experience. I also explained my mind nor body can handle or deal with any haggling or stress due to me being disable (7 strokes), as it is very difficult for me read, understand, comprehend or haggle back and forth with anything do to may mental capabilities without having someone else read it to me or for me whom I trust.

On the 19<sup>th</sup> of June I was preapproved for credit with Sterling McCall Ford. (Approved, previously by Ford Credit on the 16<sup>th</sup> with another Ford dealership.) I told Jose that I would wait on my funds transfer and then book my flight from Montgomery, AL to Houston, TX to pick up my new truck. I had explained to him in detail during several conversations "Please send me all of the paperwork in advance so I will have plenty of time to read and understand everything before I fly out to Houston." I wanted to understand the contracts, the pricing, and the terms. And I stressed that I did not want any added "fluff" i.e . Tailgate locks, wheel locks, invisible car spray, added floor mats, window tint, or any other dealer added or offered stuff that is NOT a part of the BOM from production. All I wanted to do is arrive at the airport and pick up my truck and go to my hotel for my next day drive to Alabama.

I notified Jose on the June 23<sup>rd</sup> all was good on my end for travel to Houston on the 24<sup>th</sup> to pick up my F-150. I had planned to arrive at the dealership around 3pm. Upon my arrival I was asked to waiting until he was done with another customer. I completely understand the "wait your turn" in the walkup sales environment, especially during the weekend, but they knew I was coming. The main reasons why I wanted to complete all buy experiences by phone and electronic documents. I'd asked again to see my paperwork while I was waiting, **It was not provided**, because it was not ready. So I waited.

But, while I was waiting, I overheard another sales rep tell another customer that if they wanted to make a deal that he could have "these items" referring to the dealer added items removed from the sale of their car to make a deal. I was floored! Jose told me that these items could not be removed from the truck. However, this other salesman is telling his customer that he can remove these items but, Jose is telling me he can't. In respect to my health, and to keep myself from getting stressed out and causing a 8<sup>th</sup> stoke, I remained claimed and vowed not to press the issue in the dealership. It's time for me to get my deal completed, I am the last customer in the building I then go to Finance. Finance tells me they have me all set and ready for me to sign the paperwork at over 13% interest. NOT POSSIBLE when I have been approved with Ford Credit for 0% for 36 month. Why! This is what I wanted to avoid a week before



I flew out, games, manipulation, and confusion. Due to my disability, my mind cannot handle nor comprehend too much at one time and this was discussed during my first conversation to Jose at Sterling McCall Ford by phone, via CarGurus

It was late, so the gentleman in finance states that he would have to complete on Monday to get approval from Ford Credit. This was a plan that seems to work as the sales condition of the vehicle was POOR condition to take delivery. The F-150 needed a paint job, yes! Yes, a paint Job. This dealership has now caused me to stay extra time, not planned, in Houston creating financial harm to me(Extra hotel cost, meals, gas, and fees)

I was told I would have to come back Monday to have the body shop REPAINT my door on the passenger side due to DEEP scratches to the metal also the driver's side roof pillar. Now a quick trip to Houston is now being delayed so Sterling McCall Ford can do a task that should have been completed before Saturday during customer pick up, it was NOT. I also was very upset that this dealership also still was DISHONEST about the add-ons that I stressed I did not want. However, I was FORCED to take them or go home to Alabama without a vehicle. I pointed out the Window tint was not done correctly and was **ripped** or crinkled during installation. I explained, fixed it correctly or remove it from my bill. **NEITHER** was done. It shocked me that McCall Ford sold me a brand new truck with paint problems and problems with dealer added items they want me to take. MY BACK IS TO THE WALL. I have to take what is being offered, leave with nothing, or select a higher priced truck.

Not only do I feel I was disrespected by the sales team and finance department was completely out on line and no one from the dealership management came to apologize for the horrible inconvenient for me having to book hotels until Tuesday, due to them having the paint issues corrected late afternoon Monday; I was having an experience beyond words and disbelief. A Saturday trip, leave on Sunday after church turn into a wait in the bitter Texas heat until Tuesday with a Truck that is still not correct. But as I stopped to have a meal on Monday I was reading the paperwork that was showed to me swiftly to sign on Saturday evening I noticed a form for me paying for \$1000 for dent repair contract. WHAT!! Now, the finance depart has joined in the "thief by deception". I told them I wanted NOTHING beside my truck, no added anything. This dealership has been 100% dishonest with the customer; this customer has a name, Al Edmonds. This why I had explained several times to the salesman, Jose." Please send me all documents from sales and finance BEFORE I BOOK MY FLIGHT I would like to read and comprehend everything". Seems when I said that I was a target to do whatever to gain more from me based what I could not understand. Just in March of 2024 the dealership finally refunded my deposit hold payment of \$1000 on this vehicle. If they would have sent these documents before as I request several times. I would have reviewed and remembered this. I was told that I need to supply Ford Motor Credit (per Sterling McCall) with my property TAX documents on a property that I **do not own**. Yet when I spoke to FoMoCo they said all was well on their end there is nothing left to be done and this was not the case. This is impossible, I cant provide tax documents for a property that is not my own.

I have been living in fear `when driving my vehicle. I've been Stopped in McAllen, TX, Atlanta, GA, Montgomery, AL, US MEX border, Vermont, White Plains, NY, Columbus, GA, Nashville, TN, Branson, MO, Carmel, IN and the list goes on. Thank God I have been given warnings, but enough is enough. I can no longer take the fear and trauma of driving my F-150 due to Ford mishandling my automotive purchase with gross incompetence and with malice behavior which has caused considerable amount of harm, pain, humiliation and embarrassment.

To add to the embarrassment I was informed by Jose, this was a Ford Corporate own store (Interesting). So now, I am fully aware Ford Motor Company and the Sterling McCall Ford dealership has engaged in;

1. Thief by Deception to obtain a disabled customer money.
2. Wasting a customer's time by making them for wait days to address damage to a new car
3. Trying to give a customer a HIGH interest loan other than what was previously agreed upon
4. Adding items to an end of a contract for added dealership profits or in this case Ford's
5. This dealership has caused pain financial and emotional, ongoing embarrassment, humiliation.
6. Fraud for not providing a tag , 11 months and counting after purchasing the vehicle
7. Keeping a customer's deposit for 9 months after purchase.

I find this hard to believe this is a "Ford own Dealership", I did not know Henry Ford was for this demeaning culture towards their disabled customers or for any customers who are looking for a new vehicle. Or maybe this is what Jim Farley, CEO, Ford was speaking of when he spoke of increasing the company's profits with growth and value added services.

Screw our customers and stick to the disabled customers who have trouble comprehending documents. And furthermore anyone who's in need of assistance reading, understanding and exploring contracts. SCREW THEM, and give them nothing! Just take! No time to review complex agreements, don't provide them adequate time or accommodations to seek assistance when the customers ask. We at the Ford Motor Company and Group1 Automotive (GPI, NYSE) will profit off their misfortune.

Once an Executive Vice President myself, I would love to think of myself as being facetious, but as of 5/29/2024, I am not. Sterling McCall Ford in Houston, TX Ford Motor Company, and Group1 has cause emotional, financial, distress, harm and embarrassment to me, A HEARTBROKEN CUSTOMER!

And please accept my apologies for the delay in the letter; it was a difficult task to complete with my ongoing disabilities in a timely matter.

I have videos of my experiences in the dealership with false statements made to me, available on request.

Regards,

Al Edmonds-

678-414-3763

CC/

Jim Farley President,-Ford Motor Company

William Clay Ford Jr.- Chairman Ford Motor Company

Beth A. Rose-General Counsel Ford Motor Company

Dave Boseman- Vice President, Ford Customer Service

Daryl Kenningham- CEO, Group 1 Automotive



Mike Jones-SVP Aftersales, Group 1 Automotive

Gillian Hobson- Chief Legal, Group 1 Automotive

Jennifer Calfas Wall Street Journal

Ken Paxton-Attorney General, Texas

US Department of Consumer Complaints

Federal Trade Commission

Texas State Auditor's Office

Henry Jones- Jones & Assoc.

Megan Munce, Houston Chronical [megan.munce@chron.com](mailto:megan.munce@chron.com).

Brooke Taylor ABC 13 Houston News[Brooke.taylor@abc.com](mailto:Brooke.taylor@abc.com).

Jeremy Rogalski KHOU 11 News

Maria Town, CEO of American Association of People with Disabilities

Giselle Greenwood Houston Business Journal [ggreenwood@bizjournals.com](mailto:ggreenwood@bizjournals.com)

Car Gurus

Sterling McCall Ford

EEOC

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## re: Conversation

Crow, Rodney

To me · Wed, Jun 12, 2024 at 10:37 AM ▾

Mr. Edmonds,

Thank you for taking my call today. I wanted to email you to confirm that I will reach out to you, on Friday evening, at 5:15 pm per your request. As I stated, I am willing to participate in helping you get license plates in Alabama and look forward to our continued discussion on Friday. Please feel free to contact me either by email or on my cell (281-382-6144) if anything comes up in the meantime.

Best regards,

***Rodney Crow***

General Manager

STERLING MCCALL FORD

6445 Southwest freeway

Houston, Texas 77074

Tel. 281-588- 5001

fax # 281-708-3817

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## PERSONAL PROPERTY TAX RECEIPT

Bian, Wally

To me · Thu, Nov 16, 2023 at 12:48 PM ▾

Hi Al

Per our convo, I need a personal tax receipt for your property to finish titling out your vehicle.

I will be sending the power of attorney's for you to sign at:

1655 Gilmer ave  
montgomery, al 36104

**Wally Bian**

Finance Manager  
Sterling McCall Ford  
6445 Southwest Freeway  
Houston, TX 77074

Direct: 281.588.5174

Email: cbian@sterlingmccallford.com

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## Social Security Administration Benefit Verification Letter

Date: February 26, 2025  
BNC#: 25GN674F31374  
REF: A, DI



ALBERT EDMONDS III  
1655 GILMER AVE  
MONTGOMERY AL 36104-5621

\*0101BEV1L98G37B\* CCM.M72.BEV1L.R260226

You asked us for information from your record. The information that you requested is shown below. If you want anyone else to have this information, you may send them this letter.

### Information About Current Social Security Benefits

Beginning December 2024, the full monthly Social Security benefit before any deductions is \$2,412.70.

We deduct \$0.00 for medical insurance premiums each month.

The regular monthly Social Security payment is \$2,412.00.  
(We must round down to the whole dollar.)

Social Security benefits for a given month are paid the following month. (For example, Social Security benefits for March are paid in April.)

Your Social Security benefits are paid on or about the third of each month.

We found that you became disabled under our rules on April 9, 2022.

### Information About Past Social Security Benefits

From December 2023 to November 2024, the full monthly Social Security benefit before any deductions was \$2,353.90.

We deducted \$0.00 for medical insurance premiums each month.

The regular monthly Social Security payment was \$2,353.00.  
(We must round down to the whole dollar.)

### Type of Social Security Benefit Information

You are entitled to monthly disability benefits.

See Next Page



25GN674F31374

Page 2 of 2

### **Information About Supplemental Security Income Payments**

Beginning June 2024, the current Supplemental Security Income payment is \$0.00.

This payment amount may change from month to month if income or living situation changes.

Supplemental Security Income Payments are paid the month they are due.

(For example, Supplemental Security Income Payments for March are paid in March.)

Payments were stopped beginning June 2024.

We found that you became disabled under our rules on January 24, 2023.

### **Type of Supplemental Security Income Payment Information**

You are entitled to monthly payments as a disabled individual.

### **Medicare Information**

You are entitled to hospital insurance under Medicare beginning October 2024.

Your Medicare number is 5EK4D39KY66. You may use this number to get medical services while waiting for your Medicare card.

If you have any questions, please log into Medicare.gov, or call 1-800-MEDICARE (1-800-633-4227).

### **Date of Birth Information**

The date of birth shown on our records is February 29, 1976.

### **Suspect Social Security Fraud?**

Please visit <http://oig.ssa.gov/r> or call the Inspector General's Fraud Hotline at 1-800-269-0271 (TTY 1-866-501-2101).

### **If You Have Questions**

#### **Need more help?**

1. Visit [www.ssa.gov](http://www.ssa.gov) for fast, simple and secure online service.
2. Call us at **1-800-772-1213**, weekdays from 8:00 am to 7:00 pm. If you are deaf or hard of hearing, call TTY **1-800-325-0778**. Please mention this letter when you call.
3. You may also call your local office at **1-866-593-0914**.

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